

BRAD AMOS,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 3:21-cv-00923
)	Judge Richardson
THE LAMPO GROUP, LLC,)	Jury Demand
)	
)	
Defendant.)	

Plaintiff, Brad Amos, through undersigned counsel, moves that the Court deny Defendant's Motion in Limine Number 13 preventing evidence or argument at trial regarding damages he cannot recover under Title VII or the Tennessee Human Rights Act.

Relocation was necessary in order for Plaintiff to accept the position with Defendant, and Defendant knew Plaintiff was relocating to Tennessee solely for the position with Defendant. Naturally, relocation after his termination was foreseeable to Defendant. Plaintiff sold his home in

California to move to Tennessee, but could no longer afford the same home after his termination. Similarly, the real estate fees and commissions were a foreseeable consequence of Plaintiff having to move to Tennessee, especially since it was Defendant's ELP that assisted with the sale of the home. Similarly, Ms. Amos giving up her job was a foreseeable consequence of Plaintiff moving to Tennessee.

Similarly, therapy expenses is a measure of compensatory damages. Plaintiff's son required therapy after Plaintiff's termination. Since Plaintiff was no longer employed the costs and expenses for the therapy were out of pocket expenses for which Plaintiff is entitled to reimbursement.

For the above reasons, Plaintiff respectfully moves the Court to deny Defendant's thirteenth motion in limine and allow evidence of Plaintiff's lost home equity, real estate fees and commissions, lost spousal earnings, and one year of therapy.

Respectfully Submitted,

**THE EMPLOYMENT AND COMMERCE
LAW GROUP,**

/s/ Jonathan A. Street

JONATHAN A. STREET, BPR No. 027172

G. BRANDON HALL, BPR No. 034027

ZACHARY W. BROWN, BPR No. 037509

1625 Broadway, Suite 601

Nashville, TN 37203

(615) 850-0632

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served electronically via the Court's CM/ECF system this 30th day of June, 2025 to the following:

Leslie Goff Sanders (TN #18973)
Daniel C. Crowell (TN #31485)
Stephen C. Stovall (TN #37002)
Eric C. Lyons (TN #36105)
Molli A. Guinn (TN # 41258)
BARTON LLP
611 Commerce Street, Suite 2911
Nashville, TN 37203
Tel.: (615) 340-6790
Attorneys for Defendant

/s/ Jonathan A. Street
Jonathan A. Street